

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, DC 20460



OFFICE OF CHEMICAL SAFETY
AND POLLUTION PREVENTION

August 27, 2014

IMS Trading, LLC
c/o
Henry M. Jacoby
ACTA Group
2200 Pennsylvania Ave., N.W. Suite 100W
Washington D.C., 20037

Subject: Amendment to revise label claims in response to an Agency letter dated 06/27/13
Product Name: IMS Original Moth Balls
EPA Registration Number: 81433-6
Application Date: August 19, 2014
Decision Number: 480360

Dear Mr. Jacoby:

The amended label referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide and Rodenticide Act, as amended, is acceptable.

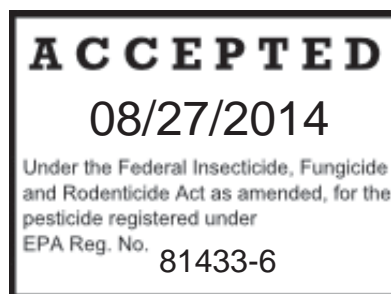
A stamped copy of your labeling is enclosed for your records. This labeling supersedes all previously accepted labeling. You must submit one (1) copy of the final printed labeling before you release the product for shipment with the new labeling. In accordance with 40 CFR 152.130(c), you may distribute or sell this product under the previously approved labeling for 18 months from the date of this letter. After 18 months, you may only distribute or sell this product if it bears this new revised labeling or subsequently approved labeling. "To distribute or sell" is defined under FIFRA section 2(gg) and in 40 CFR 152.3.

Your release for shipment of the product constitutes acceptance of these conditions. If these conditions are not complied with, the registration will be subject to cancellation in accordance with FIFRA section 6(e). If you have any questions, please contact Gene Benbow by phone at 703-347-0235 or via email at Benbow.gene@epa.gov.

Sincerely,

A handwritten signature in black ink, appearing to read "M F Laws for".

Meredith F. Laws, Chief
Insecticide-Rodenticide Branch
Registration Division
Date: August 27, 2014



**[SMART LIVING ORIGINAL MOTH BALLS]
[SMART LIVING][IMS][LAVENDER SCENTED]
[CEDAR SCENTED]**

- > **[New packaging! (to be used for six months after first marketing of new packaging)]**
- > **[New packet wraps! (to be used for six months after first marketing of new packaging)]**
- > **[Now wrapped for ease of use!]**
- > **[Now wrapped for convenient use!]**

- > **[Easy use of pre-measured packets]**
- > **[Accurate pre-measured sachets]**
- > **[Ideal sized packets for easy use]**
- > **[Single use [breathable] packs]**
- > **[Packets are ideally sized for small storage spaces]**
- > **[Minimize waste!]**
- > **[No mess, no guesswork!]**
- > **[Guesswork eliminated!]**
- > **[Pre-measured for optimum efficacy]**
- > **[Pre-measured for convenience]**
- > **Measured quantity delivers the exact amount necessary to kill moths, their eggs, and larvae**

- > **[Wrapped for protection against contact]**
- > **[No-touch packaging]**
- > **[No direct handling of product]**
- > **[No [immediate] contact with skin]**
- > **[Protective wrap guards against direct skin contact]**
- > **[Breathable film effective against moths but still provides a barrier against skin contact]**
- > **[Protective breathable wrap creates a barricade against direct skin contact]**
- > **[Protective wrap – effective against moths and effective barrier against skin contact]**

IMS ORIGINAL MOTH BALLS

Kills Clothes Moths
Kills Moths, Eggs, and Larvae in Storage Closets, Trunks,
Chests, Garment Bags, and Air Tight Containers
Protects in Winter and Summer

Active Ingredient:

Naphthalene	99.95%
Other Ingredients	0.05%
Total	100.00%

KEEP OUT OF REACH OF CHILDREN

WARNING

**SEE BACK (SIDE) PANEL(s) FOR PRECAUTIONARY
STATEMENTS AND FIRST AID**

Net Contents: ____ oz.

[4, 5, 6, 10, 12, 14, 16, 24, 32, or 48 oz.]

EPA Reg. No. 81433-6

EPA Est. No. _____

PRECAUTIONARY STATEMENTS:
HAZARD TO HUMANS AND DOMESTIC ANIMALS

WARNING: May be fatal if inhaled. Do not breathe vapors. Avoid contact with skin, eyes, or clothing. Remove contaminated clothing and wash before reuse. Harmful if swallowed. Wash thoroughly with soap and water after handling.

Not for sale in the State of California.

Keep Out of Reach of Children. Do not place in areas accessible to children.

FIRST AID	
If Inhaled	<ul style="list-style-type: none">• Move person to fresh air.• If a person is not breathing, call 911 or an ambulance, then give mouth-to-mouth respiration.• Call a poison control center or doctor for treatment advice.
If Swallowed	<ul style="list-style-type: none">• Call poison control center or doctor immediately for treatment advice.• Have person drink several glasses of water.• Do not induce vomiting.• Do not give anything by mouth to an unconscious person.
If in Eyes	<ul style="list-style-type: none">• Hold eyes open and rinse with water for 15-20 minutes.• Remove contact lenses after 5 minutes and continue rinsing eyes.• Call a poison control center or doctor for treatment advice.
If on Skin or Clothing	<ul style="list-style-type: none">• Take off contaminated clothing.• Rinse skin immediately with water for 15-20 minutes.• Call a poison control center or doctor for treatment advice.
HOTLINE NUMBER	
Have the product container or label with you when calling a poison control center or doctor, or going for treatment. You may also contact the National Pesticide Information Center (NPIC) at 1-800-858-7378 for emergency medical treatment information.	

Physical or Chemical Hazard: Combustible. Do not use or store near heat or open flame.

STORAGE AND DISPOSAL

Do not contaminate water, food or feed by storage or disposal.

Pesticide Storage: Store only in original container in a cool, dry place not accessible to children and pets. Keep container closed and away from other chemicals.

Pesticide Disposal and Container Handling: Non-refillable container. Do not refill or reuse this container. Offer for recycling, if available.

If Empty: Place in trash or offer for recycling, if available.

If Partly Filled: Call your local solid waste agency or 1-800-CLEANUP for disposal instructions. Never place unused product down any indoor or outdoor drain.

DIRECTIONS FOR USE

It is a violation of Federal Law to use this product in a manner inconsistent with its labeling.

IMPORTANT: Keep out of reach of children. Do not place in areas accessible to children.

IMPORTANT: It is illegal to sell sachets individually. Do not open sachets.

Kills clothes moths and their larvae and eggs in storage closets, trunks, chests, garment bags, and containers (air tight). Do not use dry cleaning bags or containers which will allow vapors to escape into occupied rooms. Naphthalene moth balls must not be mixed or placed in contact with paradichlorobenzene moth balls or flakes, or other moth preventive products or chemicals. For use only on clothes containing wool or wool blends.

Before storing clothes, have them dry cleaned, wash or brush articles to be protected and stored. Apply at a rate of one ounce of moth balls per three cubic feet.

Apply product in air tight containers, bags, and closets at the following rates:

<u>Ounces of Product</u>	<u>Volume of Enclosed Space</u>
4	Average garment bag (12 cu. ft.)
[5	Large trunk (15 cu. ft.)
[6	(18 cu. ft.)
[10	(30 cu. ft.)
[12	(36 cu. ft.)
[14	Small closet (42 cu. ft.)
[16	(48 cu. ft.)
[24	(72 cu. ft.)
[32	(96 cu. ft.)
[48	(144 cu. ft.)

For other spaces, volumes can be calculated by measuring and multiplying the height, width, and depth of the area for treatment. To insure protection, use the specified amount of product and maintain treatment for a minimum of seven days. To maintain protection over long term storage, replace moth balls that have dissipated.

Upon removing clothing from treatment, place in well ventilated area, odor will dissipate.

[Distributed by:]/[Sold by:]
[Name and address of distributor]

Manufactured by:
IMS Trading, LLC
6010 Wilshire Blvd, Suite 400
Los Angeles, CA 90036
[Made in China]

Batch No. _____